

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
BILLINGS DIVISION

FRIENDS OF THE CRAZY
MOUNTAINS, et al.,

Plaintiffs,

vs.

MARY ERICKSON, in her capacity
as Forest Supervisor for the Custer-
Gallatin National Forest, et al.,

Federal-Defendants.

19-CV-00066-SPW-TJC

DECLARATION OF
LOUIS B. GOOSEY

I Louis B. Goosey declare as follows:

1. I reside in Livingston, Montana. I am over 18 years of age and competent to testify. I have personal knowledge of each of the facts set forth below.

2. I am a member of the Montana Chapter of Backcountry Hunters and Anglers, a plaintiff in this case.

3. I grew up near Big Timber, Montana. My family lived about 8 miles up Big Timber Creek. From the time I was a teenager, there has never been a year that I haven't hiked and explored the Crazy

Exhibit T

Mountains. In the summers, we would spend most of our time hiking the Crazies, Big Timber Canyon in particular. I have hunted in the Crazy Mountains on numerous occasions, including Big Timber Canyon, the Swamp Creek drainage, the Cottonwood drainage, and near Ibex Mountain.

4. I am familiar with the U.S. Forest Service's (USFS's) proposed Porcupine Ibex Trail Project. I understand that the Project will involve closing portions of two existing National Forest System trails, the Porcupine Lowline trail (No. 267) and Elk Creek trail (No. 195), building a new trail in a steeper area nearby, securing an easement from a private landowner for the new trail, and relinquishing easement "interests" to use and access portions of the current National Forest System trails (267 and 195), which I've used on numerous occasions. I do not support the project.

5. I have enjoyed hiking Trail 267 to Campfire Lake and camping there. I have also hiked from there on Trail 268 along Trespass Creek.

6. In July 2017, my wife and I drove to the Porcupine trailhead to hike and explore the area. The trail at the trailhead was barricaded

with barbed wire and “no trespassing” signs. We nevertheless walked Trail 267 to Trail 195 and took Trail 195 to Trail 268 until we looked down on Campfire Lake. It was a nice day trip. It is really unfortunate that this section of Trail 195 will now be closed as part of the Porcupine Ibex project.

7. For years, I have also enjoyed the portions of the Porcupine Lowline Trail (Trail 267) that are slated to be closed. That trail is gradual and quite a nice walk.

8. I plan to return to the Porcupine trailhead soon. Next birthday I'll be 80, and I plan to walk on Trail 267 at least through the locked gate. I plan to continue to walk on the Porcupine Lowline Trail if it is still accessible.

9. I have also explored the area where the new trail is proposed. I can say with confidence that it is not a place where a trail should ever be built. The area is very steep, and I imagine it will wash out every year in the spring. The trail is going to have to keep cutting across drainages and coulees and washes that run downhill, and I can't think they're going to be able to adequately maintain that trail.

10. Even worse, the new trail is going to disrupt the big game that wants to live on that mountainside. The area currently provides good, secure habitat for deer and elk. A new trail used for mountain biking will threaten habitat security and disrupt an area where the game takes sanctuary.

11. The reason for building the new trail seems to be to appease a private landowner who is outfitting in the area and wants to keep the public off the trails. I don't think the USFS should reward the private landowners for illegally attempting to obstruct public access on the trails.

12. I am an advocate for public access. I have enjoyed the mountains and the trails and National Forest Service lands in the Crazy Mountains from the time I was a teenager, and I have children and grandchildren that want to do the same. I'm afraid they won't have that opportunity if people are closing trails and right of ways as proposed by the Porcupine Ibex project.

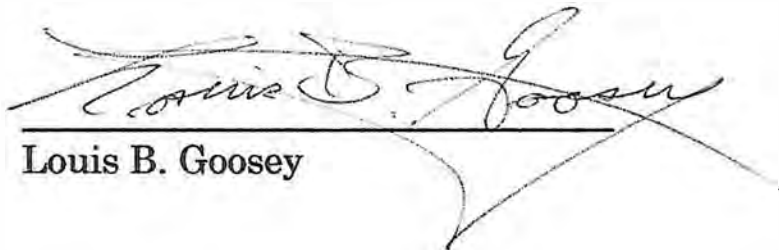
13. I am also an advocate for habitat security. The more travel you have in an area, the more game has to move someplace else. Here,

Here, you're putting a trail for mountain bikes where a trail doesn't need to be, unnecessarily compromising habitat security.

14. I believe if the Porcupine Ibex trail project goes forward, my interests in using trails 267 and 195 as they currently (and have historically) existed and my interest in preserving the undisturbed forested lands in the area that are important to big game will be irreparably harmed. I will not have an opportunity to walk the Porcupine Lowline Trail again. It's a beautiful walk and not that difficult for someone my age. I won't be able to hike the new trail—a person 80 years old will have difficulty getting up on that mountain.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed this 26th day of June, 2019.



Louis B. Goosey